

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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|---|---|------------------------------------|
|   | : | <b>Chapter 13</b>                  |
| <b>In Re: Robert &amp; Helena Titus</b> | : |                                    |
| <b>Debtor</b>                           | : | <b>Bankruptcy No. 19-17728-AMC</b> |
|   | : |                                    |
|   | : | <b>Motion to Modify Plan</b>       |
|   | : | <b>Post Confirmation</b>           |
|   | : | <b>Reference Docket No. 102</b>    |

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**CERTIFICATION OF NO RESPONSE TO  
MOTION TO MODIFY PLAN POST CONFIRMATION**

I, Jeffery A. Fournier, Esquire, attorney for Debtors, hereby certifies the following:

1. That a Motion to Modify Plan Post Confirmation was filed on November 25, 2020.
2. Notice of the Motion to Modify Plan Post Confirmation was served upon all creditors and interested parties on or about November 25, 2020.
3. There has been no response by creditors or interested parties.

**WHEREFORE**, I respectfully request that the Motion to Modify Plan Post confirmation be approved.

/s/ Jeffery A. Fournier, Esquire  
Jeffery A. Fournier, Esquire  
Attorney for Debtors